

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-01900034-2011**
Application Received: **August 31, 2010**
Plant Identification Number: **03-054-019-00034**
Permittee: **Georgia-Pacific Wood Products LLC**
Mailing Address: **79 North Pax Avenue, Mt. Hope, WV 25880**

Physical Location:	Mt. Hope, Fayette County, West Virginia
UTM Coordinates:	483.5 km Easting • 4,194.5 km Northing • Zone 17
Directions:	From I-77/I-64, take the North Beckley exit onto Highway 19. Exit at Mt. Hope and turn left onto Pax Avenue. Take the first right into the plant entrance.

Facility Description

Georgia-Pacific Wood Products LLC's Mt. Hope OSB Mill is a reconstituted wood products facility covered by Standard Industrial Classification (SIC) Code 2493. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of the following: Wellons Energy/Dryer System, auxiliary gas burner, pressing operations, former area, long mat trim system, two (2) paint booths, finishing area, sander dust fuel system, dry fuel system, sanding area, screen fines, storage tanks, and the screening building dedust system.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions ¹	2009 Actual Emissions ¹
Carbon Monoxide (CO)	324.7 ⁵	45.0
Nitrogen Oxides (NO _x)	266.4	62.2
Particulate Matter (PM ₁₀) ³	232.55 + 10.80 = 243.35 ⁶	52.83 + 5.19 = 58.02
Total Particulate Matter (TSP) ³	182.69 + 32.10 = 214.79	34.41 + 17.53 = 51.94
Sulfur Dioxide (SO ₂)	21.3	0.25
Volatile Organic Compounds (VOC)	165.7 ⁷	54.8
Hazardous Air Pollutants	Potential Emissions ^{1, 2}	2009 Actual Emissions ¹
Acetaldehyde	14.60	5.54
Formaldehyde	25.75	9.11
Hydrogen Chloride	11.56	3.76
Methanol	46.41	13.28
Aggregate HAPs ⁴	109.61	40.89

¹ Potential and actual emissions were provided in Appendix A, Emissions Summary, of the renewal application.

² There are ninety nine (99) speciated HAPs listed in Appendix A of the renewal application. Any HAP in that list with a PTE greater than 10 tpy is listed in this Emissions Summary table.

³ The algebraic summations given above are that of Process Sources and Fugitive Sources, in that order, as transcribed from the renewal application.

⁴ The aggregate potential and actual HAPs values in the table above were calculated by this writer using the electronic Microsoft® Excel® spreadsheet file (Emissions_Summary.xls) provided in the application, and includes all HAPs listed in the application (i.e., organic/inorganic and trace metal HAPs).

⁵ The PTE for CO was 290.3 tpy after the changes associated with the significant modification (SM01) of the current permit R30-01900034-2006. This 290.3 tpy value had been computed using data available from the 2006 operating permit Final Fact Sheet (which restates the data provided in the 2006 renewal application) and PTE changes provided by the permittee in the SM01 application. In this renewal application, however, the permittee has increased the PTE to account for sources that had not been previously included in the facility's PTE. According to technical correspondence¹, the "permit limits for CO on the Wellons is 210.2 tpy and on the [Board] press it is 94.2 tpy for a total of 304.4 tpy. This does not include CO from our Auxiliary Thermal Oil Heater (19.3 tpy) or our RICE units (1.0 tpy)."

⁶ The PTE for PM₁₀ was 189.7 tpy after the changes associated with the significant modification (SM01) of the current permit R30-01900034-2006. This 189.7 tpy value had been computed using data available from the 2006 operating permit Final Fact Sheet (which restates the data provided in the 2006 renewal application) and PTE changes provided by the permittee in the SM01 application. In this renewal application, however, the permittee has increased the PTE to account for including condensable particulate with the filterable-only fraction, which according to technical correspondence¹, has been the basis for particulate PTE in the past.

⁷ The PTE for VOC was 61.3 tpy after the changes associated with the significant modification (SM01) of the current permit R30-01900034-2006. This 61.3 tpy value had been computed using data available from the 2006 operating permit Final Fact Sheet (which restates the data provided in the 2006 renewal application) and PTE changes provided by the permittee in the SM01 application. In this renewal application, however, the permittee has increased the PTE to account for sources that had not been previously included in the facility's PTE. According to technical correspondence¹, the "VOC value in the [R30-01900034-2006, SM01] Fact Sheet does not include emissions from the blenders or the log deicing system...or any of the pneumatic systems."

¹ December 20, 2010 email to this writer from Mr. Kim Casto, Environmental Manager for the permittee.

Title V Program Applicability Basis

This facility has the potential to emit 324.7 tpy of CO; 266.4 tpy of NO_x; 243.35 tpy of PM₁₀; 214.79 tpy of TSP; 165.7 tpy of VOC; 14.60 tpy of acetaldehyde; 25.75 tpy of formaldehyde; 11.56 tpy of hydrogen chloride; 46.41 tpy of methanol; and 125.04 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Georgia-Pacific Wood Products LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR7	PM from Manufacturing Processes
	45CSR10	Prevent and Control Emissions of SO ₂
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction permits
	45CSR16	Standards of performance pursuant to 40 C.F.R. 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. 60 Subpart Dc	NSPS for small industrial-commercial-institutional steam generators
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart DDDD	Plywood and Composite Wood Products NESHAPs-MACT
	40 C.F.R. 63 Subpart ZZZZ	RICE NESHAPs-MACT
	40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM)
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-1622H	December 14, 2009	
R13-2261A	February 23, 2000	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

I. **45CSR30 – Requirements for Operating Permits.**

- a. **Compliance Requirements.** In keeping with 45CSR§30-5.3.a., the operating permit was reviewed to ensure that each limitation or standard is accompanied by an appropriate permit condition (or conditions) used to demonstrate compliance with the limit or standard. The following issues will therefore be addressed:
 - i. **Condition 7.1.1.** sets hourly particulate matter mass limits for multiple emission sources. In particular, the Silos 8950 and 9600 both have hourly PM limits. This writer examined the current operating permit to ascertain the method for compliance demonstration. After not readily finding one within the permit, this writer asked the permittee what method is used to demonstrate compliance with the mass rate limits. The permittee responded in technical correspondence¹ that the emission limits in condition 7.1.1. for Silos 8950 and 9600 are actually for the pneumatic transfer systems which collect the material from other pneumatic systems within the facility for deposition of the collected material into the silos. As such, as with the other pneumatic systems at the facility, compliance is (and will) be demonstrated by conducting visible emissions observations of the exhausts from these pneumatic systems. The compliance method is found in current condition 3.2.1. To clarify this and direct the reader to the compliance demonstration method, a reference condition has been written as 7.2.4.
 - ii. **Condition 7.1.3.** requires no visible emissions from Silos 8950 and 9600. It may be reasonably expected to find a Method 22 monitoring requirement in permit subsection 7.2., but there is none. There is, however, facility-wide condition 3.2.1. that requires weekly visible emission monitoring employing Method 22 (and Method 9 if necessary). So while the necessary monitoring to demonstrate compliance with 7.1.3. is contained in the permit, it is not readily apparent. Therefore, as described above for condition 7.1.1., likewise for condition 7.1.3. a new reference condition 7.2.4. has been created to refer to facility-wide monitoring condition 3.2.1.

¹ October 12, 2010 email to this writer from Mr. Cliff Bowling, Sr. Environmental Engineer for the permittee.
West Virginia Department of Environmental Protection • Division of Air Quality

- b. **Compliance Plan for Unpermitted Sources & Changes to Emission Units Table.** Table A below specifies emission sources that the permittee included in the Emission Units Table (Attachment D) of the renewal application which are neither contained in the current Title V permit, nor any underlying permit (R13-2261A, R13-1622H). Specifics regarding each source are given following Table A.

Table A

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
6000	6000	Blenders	1995	46.5 OD tons/hr	None
Fugitive	Log Deicing	Log Deicing/Conditioning	1995	90 tons/hr	None
Fugitive	Misc. Coatings	Miscellaneous Coating Operations under PCWP MACT	1995		None
RICE	RICE	Emergency Use – Reciprocating Internal Combustion Engines (RICE)	1995	18 – 255 hp	None

Blenders (6000). The potential emissions of VOC and Methanol from the Blenders (as listed in application Attachment E) are given below:

Pollutant	lb/hr	tons/yr
VOC	9.23	35.0
Methanol	3.64	13.8

Emissions of both pollutants trigger a “Modification” under 45CSR§§13-2.17.a. and 2.17.b., respectively. Further, the potential VOC emissions of 9.23 lb/hr and 35.0 ton/yr both exceed the thresholds of 2 lb/hr or 5 ton/yr that were in effect for regulated air pollutants other than HAPs or TAPs when the facility was constructed in 1995. This was determined by examining 45CSR13 that was filed and became effective on April 27, 1994. Therefore, the Blenders are not “grandfathered”. Further, this writer did not find a Permit Determination in the DAQ files regarding the Blenders. This writer asked the permittee if they have submitted a permit determination, permit modification application, or any other documentation to DAQ with regard to permitting the Blenders. The permittee responded in technical correspondence¹ that the “Blenders have always been listed as process equipment in the applications submitted for the facility. However, it wasn’t until the previous Title V application was submitted in 2005 that emission estimates were provided based on updated AP-42 (and/or NCASI) emissions data.” The application states that a PM limit of 32.7 lb/hr (from 45CSR§7-4.1.) is applicable to the Blenders, and to demonstrate compliance current condition 7.2.3. is cited. Currently, condition 7.2.3. requires VE’s for the Bark Hog (2230), the Log Debarkers (1050), and the Log Flakers (2000), while nothing is specified regarding the Blenders. The language “Blenders (6000)” has been added among the emission sources already listed in condition 7.2.3. Nevertheless, the permittee needs to have the Blenders permitted under 45CSR13 since the emissions of VOC and HAPs trigger a modification.

¹ September 16, 2010 email to this writer from Mr. Kim Casto, Environmental Manager for the permittee.

45CSR7 – To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations

As mentioned above, the application states that the Blenders are subject to a PM mass rate limit of 32.7 lb/hr, which comes from 45CSR§7-4.1. This limit is correct, and is based on the determination that the Blenders are a Type ‘a’ source operation (as defined at 45CSR§7-2.39.a.) since the wood flakes undergo physical change in the Blenders, but no chemical change. The application states that the flakes are mixed with the resin and wax within the Blenders prior to being formed into a mat. The Blenders (6000) and the 32.7 lb/hr limit have been added as the last row in the table in permit condition 7.1.1. The authority of 45CSR7-4.1. is already cited under the condition.

Log Deicing/Conditioning. According to application Attachment E for this source, the emissions are considered fugitive, which are given in the table below.

Pollutant	lb/hr	tons/yr
VOC	5.14	22.49
Acetaldehyde	0.32	1.42
Methanol	0.51	2.22

The potential emissions given in the application are less than the modification thresholds under 45CSR§§13-2.17.a. and 2.17.b. However, since the source has not been reviewed under NSR, it should be included with the application required by the compliance plan discussed below.

Miscellaneous Coating Operations. According to application Attachment E for this source, the emissions are considered fugitive.

Pollutant	lb/hr	tons/yr
PM _{2.5}	0.60	2.17
PM ₁₀	0.60	2.17
TSP	0.60	2.17

While the Miscellaneous Coating Operations are subject to certain applicable requirements of the 40 C.F.R. 63 Subpart DDDD (PCWP MACT), this source has not been reviewed under NSR; therefore it is included in the compliance plan discussed below.

Reciprocating Internal Combustion Engines (RICE). The following RICE were included in the renewal application.

EU ID	Description	Installation Date	HP	Fuel	Permittee's Suggested Operating Schedule
RICE-1	Firewater Pump Engine	4/01/1995	255	Diesel	500 hr/yr
RICE-2	Thermal Oil Pump Engine	4/01/1995	41	Natural Gas	500 hr/yr
RICE-3 through RICE-8	Dryer Drum Engines	4/01/1995	18	Gasoline	500 hr/yr

The emissions data provided in the application for all of these engines are based on a maximum operating schedule of 500 hr/yr. However, without an enforceable 500 hr/yr limit currently in place, the potential emissions must be calculated using 8,760 hr/yr. An observation in application Attachment E regarding RICE-1 is that its potential emission rate of NO_x is 7.91 lb/hr. Since 8,760 hr/yr must be used for PTE calculations, the annual PTE would be 34.6 ton/yr. These rates meet the criteria at 45CSR§13-2.17.a. for a modification. These engines have not been reviewed under NSR procedures. Therefore, refer to the compliance plan discussed below.

Compliance Plan. Permit condition 3.6.1. has been created to set forth a compliance plan to have the preceding sources (in Table A above) permitted according to the applicable procedures in 45CSR13, and to also modify this operating permit to incorporate NSR permit requirements that may precipitate.

- II. **40 C.F.R. 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.** All of the RICE-1 through RICE-8 meet the criteria at §63.6590(a)(1)(ii); therefore, the RICE are considered *Existing stationary RICE*. None of the RICE meet any of the criteria under §63.6590(b) for *Stationary RICE subject to limited requirements*. Similarly, none of the RICE meet any of the criteria under §63.6590(c) for *Stationary RICE subject to Regulations under 40 CFR Part 60*. Table B below primarily sets out the applicable sections from Subpart ZZZZ and describes how the requirements are applied to the permittee’s sources. However, there are some rule sections mentioned below that do not have a corresponding permit condition. While this may seem unnecessary, it is done in order to detail why the particular requirement is not applicable. Note that in the permit conditions language such as “this subpart” is replaced with “40 C.F.R. 63 Subpart ZZZZ” and other similar language changes and additions are made for clarity.

Table B

Rule Section	Cond.	Discussion
§63.6595(a)(1) <i>Affected Sources</i>	8.1.1.	Since RICE-1 is an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP, it must be in compliance with the applicable emission limitations and operating limitations no later than May 3, 2013. The language “of 40 C.F.R. 63 Subpart ZZZZ” was added to clarify what body of requirements the condition refers to.
§63.6595(c) <i>Affected Sources</i>	8.5.2.	This section is a reference within the rule to require compliance with the applicable notification requirements in §63.6645 and in 40 CFR part 63, subpart A. These sections are discussed below, and §63.6595(c) is cited with them.
§63.6602 <i>Existing stationary RICE ≤ 500-bhp at major source of HAPs</i>	8.1.2.	Since RICE-1 meets the applicability of this section, compliance must be demonstrated with applicable requirements from Table 2c of the rule. RICE-1 is an emergency stationary compression ignition (CI) RICE; therefore, the requirements in the first row of Table 2c are applicable. However, the language “and black start stationary CI RICE” is not applicable and has therefore been removed from the first sentence of the condition.
§63.6602 <i>Existing stationary RICE ≤ 500-bhp at major source of HAPs</i>	8.1.3.	RICE-2 through RICE-8 are emergency stationary spark ignition (SI) RICE, and therefore have some differing requirements in Table 2c compared to CI RICE.
§63.6605(a) <i>General requirement to comply with subpart</i>	None	This is a general requirement to comply with emission limitations and operating limitations in Subpart ZZZZ. Refer to the discussion below regarding §63.6650(d) detailing why the RICEs are not subject to any Subpart ZZZZ emission limitations and operating limitations.

Rule Section	Cond.	Discussion
§63.6605(b) <i>Good air pollution control practices</i>	8.1.4.	Inserted into the permit.
§63.6612(a) <i>Deadline for initial performance tests/compliance demonstrations for existing stationary RICE ≤ 500-bhp at major source of HAPs</i>	None	This requirement is for testing and compliance demonstration according to applicable requirements in Tables 4 and 5. Regardless of engine type (SI, CI, etc), all of the testing in Tables 4 and 5 applies to engines that must comply with numerical emission limits for CO and formaldehyde. However, the applicable requirements of §63.6602 (Table 2c, row 1) that apply to RICE-1 are not numerical limits for these pollutants. Rather, RICE-1 is subject to operating limitations specific to frequency of oil changes and inspections of the air cleaner and hoses. Thus, none of the requirements in Tables 4 and 5 are applicable to RICE-1, and so there is no permit condition for this rule section.
§63.6612(b) <i>Criteria for testing exemption</i>	None	Same rationale as above regarding §63.6612(a).
§63.6615 <i>Subsequent performance tests</i>	None	Same rationale as above regarding §63.6612(a).
§63.6620 <i>Performance tests and procedures</i>	None	Same rationale as above regarding §63.6612(a).
§§63.6625(e)(1) and (2) <i>Monitoring, installation, collection, operation, and maintenance requirements</i>	8.1.5.	The requirement in the first paragraph applies to all of the types of RICE listed in (e)(1) through (10). In the permittee's case, (e)(2) applies to RICE-1, while (e)(1) applies to RICE-2 through RICE-8. Therefore, two different citations of authority are written. One could make an argument for only citing §63.6625(e) since the numbered paragraphs (1) through (10) are essentially a list of sources subject to (e) rather than being specific requirements themselves. This writer chose to specify the number in the list for accuracy.
§§63.6630(a) and (b) <i>Initial compliance demonstration</i>	None	Same rationale as above regarding §63.6612(a).
§63.6630(c) <i>Initial compliance demonstration NOCS</i>	8.5.2.	It may be arguable whether or not an NOCS is necessary since it must contain "the results of the initial compliance demonstration", and as discussed above, there are no performance tests or compliance demonstrations for emergency stationary RICE. However, this section goes on to reference the applicable requirements of §63.6645 for the NOCS (which will be discussed below); therefore, this rule section is also cited in condition 8.5.2.
§63.6640(a) <i>Continuous compliance demonstration</i>	8.1.6.	This section states, "You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart." As demonstrated above, Table 2c contains an applicable requirement for the RICEs; thus, Table 6 was examined to determine if it contains any applicable requirements. Row 9 in Table 6 contains the applicable requirements for the RICEs.
§63.6640(b) <i>Continuous compliance demonstration</i>	8.5.1.	This is a deviation reporting requirement. The non-applicable language was removed. None of the RICE are equipped with catalysts; thus, this language is removed. There are no operating parameters that are reestablished; thus, the testing language is removed. Cross-referencing was added where appropriate.
§63.6645(a)(1)	8.5.2.	This section sets forth a reporting requirement that references the

Rule Section	Cond.	Discussion
Notifications		<p>notification requirements in 40 C.F.R. 63 Subpart A.</p> <p>§63.7(b) (<i>Notification of performance test</i>) is non-applicable for same rationale as above regarding §63.6612(a).</p> <p>§63.7(c) (<i>Quality assurance program</i>) is non-applicable for same rationale as above regarding §63.6612(a).</p> <p>§63.8(e) (<i>Performance evaluation for continuous monitoring systems</i>) is non-applicable since there is no continuous monitoring system (CMS) for the RICEs.</p> <p>§63.8(f)(4) (<i>Request to use alternative monitoring procedure</i>) is non-applicable since the permittee does not use a CMS for the RICE; thus, there is no need for an alternative.</p> <p>§63.8(f)(6) (<i>Alternative to the relative accuracy test</i>) is non-applicable since the permittee does not use a CMS for the RICE; thus, there is no need for an alternative to a relative accuracy test.</p> <p>§63.9(b)(2) (<i>Initial notifications</i>) is applicable to the RICEs. The language “which is given in permit condition 8.1.1.” has been added under the §63.9(b)(2) requirements to specify the compliance date.</p> <p>§63.9(g) is non-applicable since the permittee is not required to use a CMS.</p> <p>§63.9(h) (<i>Notification of compliance status (NOCS)</i>) is applicable to the RICEs. §63.9(h)(1) states, “The requirements of paragraphs (h)(2) through (h)(4) of this section apply when an affected source becomes subject to a relevant standard.” Therefore, paragraphs (h)(2) through (h)(4) will be examined to determine their applicability to the permittee for the RICEs.</p> <p>(h)(2) – This paragraph specifies the required contents of an NOCS in a case <i>before</i> a Title V permit has been issued. It also details the submittal deadline for the NOCS.</p> <p>(h)(3) – This paragraph specifies the required contents of the NOCS in a case <i>after</i> a Title V permit has been issued.</p> <p>(h)(4) – This paragraph is reserved; thus, there is no permit condition requirement.</p> <p>A cursory inspection of §63.9(h)(2) could be interpreted to mean its requirements cannot apply to a facility that has been issued a Title V permit. However, this is not a correct conclusion. Notice that §63.9(h)(3) goes on to read, “<i>After a title V permit has been issued to the owner or operator of an affected source, the owner or operator of such source shall comply with all requirements for compliance status reports contained in the source’s title V permit, including reports required under this part.</i>” The language from §63.9(h)(3) assumes, then, that the issued Title V permit contains requirements for compliance status reports. In the permittee’s case, such requirements for NOCS are not now included in their Title V permit. Thus, it would be impossible for the</p>

Rule Section	Cond.	Discussion
		<p>permittee to comply with §63.9(h)(3). Furthermore, the overarching purpose of both §§63.9(h)(2) and (3) are that the permittee submit the NOCS report with the required contents. The former section specifies what is required for the report if such requirements are not yet embodied in an issued Title V permit, while the latter section requires an NOCS that conforms to the requirements for NOCS that must already be specified in an issued operating permit. Since the permittee's operating permit does not contain these requirements in §63.9(h)(2) for an NOCS, they will be included in the Title V permit renewal and §63.9(h)(2) will be used in the citation of authority.</p> <p>§63.9(h)(5) is non-applicable since the permittee did not submit estimates or preliminary information in the application for approval of construction or reconstruction required in §63.5(d) in place of the actual emissions data or control efficiencies required in paragraphs (d)(1)(ii)(H) and (d)(2) of §63.5.</p> <p>§63.9(h)(6) is optional for the permittee, and so no permit condition is required for it.</p>
§63.6650(a) <i>Report submittal</i>	None	All of the requirements in Table 7 apply to non-emergency RICE. Since the permittee's RICE are emergency, the requirements of Table 7 and this rule section are non-applicable .
§63.6650(b) <i>Report submittal</i>	None	This section states, "...must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of this section." Since no requirement in Table 7 applies, there are no reports to be submitted according to (b)(1) through (b)(9). Therefore, this section is non-applicable .
§63.6650(c) <i>Report submittal</i>	None	This section is with regard to the Compliance report. However, the permittee is not subject to the Compliance report since none of the requirements in Table 7 apply. Therefore, this section is non-applicable .
§63.6650(d) <i>Report submittal</i>	None	This section requires a Compliance report to describe each deviation from an emission or operating limitation. The RICEs are neither subject to emission limitations, nor operating limitations. As demonstrated above, there are no emission limitations applicable to the RICEs. However, what is not readily apparent is whether the frequencies of oil changes and inspections are "operating limitations". Neither Subpart ZZZZ nor Subpart A defines "operating limitations". However, an understanding of what operating limitations are may be determined from the use of these terms in Subpart ZZZZ. In particular, the operating limitations for various types of RICE are specified in Tables 1b and 2b of the subpart. In these tables, operating limitations are acceptable ranges or limits for parameters such as (i) pressure drop across a catalyst; (ii) exhaust and catalyst inlet temperatures; and (iii) any operating limitations approved by the Administrator. Thus, operating limitations are parameters and their acceptable ranges for the operation of the RICE. Therefore, frequencies of oil changes and inspections of the air cleaner, hoses, and belts are not "operating limitations", and so this rule requirement is non-applicable .
§63.6650(e) <i>Report submittal</i>	None	This requirement is non-applicable since there are no applicable emission or operating limitations, and further, the permittee does not use a CMS to ensure compliance.
§63.6650(f) <i>Report submittal</i>	8.5.3.	This section requires the permittee to report all deviations as defined in this subpart in the semiannual monitoring report required by 40 C.F.R. §70.6(a)(3)(iii)(A) or 40 C.F.R. §71.6(a)(3)(iii)(A).

Rule Section	Cond.	Discussion
		which is condition 3.5.6. Since it would be possible to have a deviation (as the term is defined in §63.6675), this requirement is applicable. The compliance report language of the section is removed, however, since this report is non-applicable.
§63.6650(f) <i>Report submittal</i>	None	This requirement is non-applicable since none of the RICEs are new or reconstructed stationary RICE which fires landfill gas or digester gas.
§63.6655(a) <i>Records</i>	None	This requirement is non-applicable since there are no applicable emission and operating limitations.
§63.6655(b) <i>Records</i>	None	This requirement is non-applicable since there are CEMS or CPMS employed for the RICEs.
§63.6655(c) <i>Records</i>	None	This requirement is non-applicable since none of the RICEs are new or reconstructed stationary RICE which fires landfill gas or digester gas.
§63.6655(d) <i>Records</i>	None	This requirement is non-applicable since there are no applicable emission and operating limitations. Even though Row 9 of Table 6 is applicable (condition 8.1.6.), it is not an emission or operating limitation.
§63.6655(e) <i>Records</i>	8.4.1.	§63.6655(e)(3) is not included in the condition since it pertains to RICE located at an area source (the permittee's facility is a major source of HAP).
§63.6655(f) <i>Records</i>	8.4.2.	Since §63.6655(f)(2) does not apply, the language from §63.6655(f) and §63.6655(f)(1) were combined to form one paragraph for the permit condition.
§§63.6660(a)-(c) <i>Records</i>	8.4.3.	Inserted into the permit.

III. **45CSR42 – Greenhouse Gas Emissions Inventory Program.** This rule applies to all facilities whose greenhouse gas emissions exceed the *de minimis* amount on an annual basis given at 45CSR§42-3.1., and which are required to report emissions of regulated air pollutants pursuant to W.Va. Code §22-5-4(a)(14). The permittee is required to report emissions pursuant to this section of W. Va. Code since it is cited for current permit condition 3.1.15. The permittee's facility is subject to reporting of greenhouse gases emitted above the *de minimis* amount in the years specified by the Secretary. Refer to permit conditions 3.1.22. and 3.5.15.

IV. Miscellaneous Changes

- a. The citation of authority for condition 3.1.3. has been updated to match current accepted "boilerplate".
- b. The language for condition 3.1.5. has been updated.
- c. Current permit condition 4.1.5. is a reporting requirement, and therefore it is more appropriate to place it in permit subsection 4.5. Refer to permit condition 4.5.1. This affected, and therefore necessitated a change, to the numbering of subsequent conditions and references to them in the permit (*i.e.*, 4.4.2. 4.4.3.). Also, reference to 4.1.5.a. within this relocated reporting requirement was changed to 4.5.1.a.
- d. Current permit condition 7.2.1. in the first paragraph specifies multiple emission units that are subject to the permit condition. This listing of emission units was most likely added using the authority of 45CSR§30-5.1.c. The substantial requirement is specified in the second paragraph, which is from permit R13-2261A, condition A.3., which only applies to 8960 and 8970. Finally, the emission units specified with the citation of authority serves to limit the applicability of the condition to 8960 and 8970. This writer asked the permittee for its

understanding of the condition's applicability. In technical correspondence¹ the permittee stated "There is no question from our point of view that the requirement applies to all pneumatic systems listed in this Condition although one could read the requirement as you indicate to only apply to 8960 and 8970. We have no objection to simply removing the reference to those systems from authority citation." Since the intent of the condition is to apply to all of the emission units listed, and the permittee understands and applies the condition in this way, the language "*(Screen Fines Pneumatic Transfer System-8960, and Screening Building Dedust System-8970)*" will be removed after the citation of authority in the renewal permit.

- e. The language regarding the record retention period of no less than five (5) years has been removed from conditions 3.2.1., 3.4.4., 7.2.2., and 7.2.3. since it is redundant with condition 3.4.2.

V. **112(j) Boiler MACT Permit Language.** In permit condition 3.1.18 the date for a final rule has been changed from December 16, 2010 to January 16, 2011 in order to reflect the extension.

VI. **40 C.F.R. 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.** The Auxiliary Thermal Oil Heater (Em. Unit ID: 3600) is an affected facility under this subpart; however, because it combusts natural gas it is neither subject to the sulfur dioxide standard (§60.42c) nor the particulate matter standard (§60.43c). The only applicable requirement is 40 C.F.R. §60.48c(g)(1), which states:

Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

This recordkeeping requirement at §60.48c(g)(1) is essentially contained in renewal permit condition 4.4.2.b. (although the NSPS is not cited in the current permit). Since condition 4.4.2.b. is written entirely based on the authority of 45CSR§30-5.1.c., the language can be revised under this renewal to also suit the specific need for meeting the NSPS requirement. Further, regardless of the NSPS recordkeeping requirement, the current condition language needs to be revised so that it is more specifically suited to the limits for which it is used to demonstrate compliance (i.e., mass rate limits with units of *lb/hr*).

Therefore, the first sentence of the condition has the language "for each operating day:" added at the end to set forth the NSPS requirement. Finally, the lower-case roman numerals specifying the (i) volume of fuel, and (ii) hours of operation are added in order to tailor this recordkeeping to the corresponding limits. 45CSR16 also has been cited for this condition since this NSPS requirement has been added.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

I. **40 C.F.R. 60 Subpart III—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.** This rule does not apply to the compression ignition RICE-1 since it was constructed before July 11, 2005 (cf. applicability criteria at §60.4200(a)(2)). The rule does not apply to any of the RICE-2 through RICE-8 since they are spark ignition type.

¹ October 12, 2010 email to this writer from Mr. Cliff Bowling, Sr. Environmental Engineer for Georgia-Pacific LLC.
West Virginia Department of Environmental Protection • Division of Air Quality

- II. **40 C.F.R. 60 Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.** This rule does not apply to any of the RICE-2 through RICE-8 since they were constructed prior to all of the dates specified in §§60.4230(a)(1) through (5). The rule does not apply to RICE-1 since it is compression ignition type.
- III. **Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.** The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.
- IV. **40 C.F.R. Part 64—Compliance Assurance Monitoring (CAM).** This rule has been applied to permitted sources and incorporated into Title V permit R30-01900034-2006 (SM01) during its term. Therefore no further application of this rule is required for permitted source at this renewal. Further, based on information provided in the renewal application, this rule does not apply to the sources listed in the table below.

Blenders (Em. Unit ID# 6000). This rule does not apply to this source since it does not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal. Even if the source becomes subject to a pollutant limitation in the future, or be required to use a control device, the potential emissions of regulated air pollutants emitted from the source are less than 100 tons per year. The potential emissions of the HAP methanol is greater than 10-tpy, making it a major source of HAP. However, since there is no emission limit for this pollutant at the time of this renewal, the criterion at §64.2(a)(1) is not met for Methanol. Therefore, the Blenders are not subject to CAM.

Log Deicing/Conditioning (fugitive). This rule does not apply to this source since it does not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal. Even if the source(s) become subject to a pollutant limitation in the future, or may be required to use a control device or method, the potential emissions of regulated air pollutants emitted from the source are less than 100 tons per year. Also, the potential emissions of each HAP and aggregate HAPs are less than 10-tpy and 25-tpy, respectively. Therefore, the Log Deicing/Conditioning source is not subject to CAM.

Miscellaneous Coating Operations under PCWP MACT (fugitive). This rule does not apply to these sources since they do not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal.

Emergency Use Reciprocating Internal Combustion Engines (Em. Unit ID# RICE-1 through RICE-8). This rule does not apply to any of the RICE-1 through RICE-8 since none of them meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal. Even if the source(s) become subject to a pollutant limitation in the future, or may be required to use a control device, the potential emissions of regulated air pollutants emitted from these sources are less than 100 tons per year. Therefore, RICE-1 through RICE-8 are not subject to CAM. Since the RICEs are subject to 40 C.F.R. 63 Subpart ZZZZ, the exemption at §64.2(b)(1)(i) is met for HAPs emitted from the RICEs.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: January 3, 2011
Ending Date: February 2, 2011

All written comments should be addressed to the following individual and office:

Denton B. McDerment, P.E.
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.